

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

ELECTRONIC PRIVACY INFORMATION CENTER,

Plaintiff,

v.

Civ. Action No. 19-810 (RBW)

UNITED STATES DEPARTMENT OF JUSTICE,

Defendant.

**JOINT STATUS REPORT AND MOTION TO ADOPT
A SCHEDULE FOR FURTHER PROCEEDINGS**

Plaintiff Electronic Privacy Information Center (“EPIC”) and Defendant U.S. Department of Justice (“DOJ”), by and through undersigned counsel, respectfully submit this Joint Status Report and Motion to Adopt a Schedule for Further Proceedings.

1. The parties are currently engaged in discussions to narrow the scope of issues in dispute with respect to EPIC’s FOIA Request.

2. On October 10, 2019, the DOJ made a supplemental production of records to EPIC in response to Categories 1 and 2 of EPIC’s November 5, 2018 Freedom of Information Act (“FOIA”) request (“EPIC’s FOIA Request”). EPIC has since completed a review of those records.

3. On August 8, 2019, DOJ informed EPIC that no records responsive to Category 6 of EPIC’s FOIA Request were located.

4. In response to a request from EPIC, on October 3, 2019, DOJ provided EPIC with DOJ’s search methodology for identifying records responsive to Categories 2 through 7 of EPIC’s FOIA Request.

5. On October 10, 2019, EPIC proposed to the DOJ that the agency conduct an additional search for records responsive to Category 6 of EPIC's FOIA Request using the commonly understood definitions of the terms "reports," "recommendations," and "compilations of information."

6. The DOJ is considering EPIC's proposal.

7. The parties respectfully seek an additional month (to November 8, 2019) to reach agreement concerning next steps in this litigation.

8. Accordingly, the parties hereby move the Court to enter an order adopting the following proposed schedule:

- The parties shall file a Joint Status Report on or before November 8, 2019, which shall include a proposed schedule for further proceedings if necessary.

The adoption of this schedule will facilitate the efficient resolution of this lawsuit and conserve the Court's resources.

Dated: October 10, 2019

Respectfully Submitted,

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EPIC President and Executive Director

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/s/ John Davisson

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[PROPOSED] ORDER

Upon consideration of the parties' Joint Status Report and Motion to Adopt a Schedule for Further Proceedings, it is hereby **ORDERED** that this case will proceed according to the following schedule:

- The parties shall file a Joint Status Report on or before November 8, 2019, which shall include proposed schedule for further proceedings if necessary.

REGGIE B. WALTON
United States District Judge

Dated: _____